SOUTHERN CALIFORNIA
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Brian Katz
Vice President

July 14, 2006

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: **Docket Numbers 50-361 and 50-362**
Proposed Change Number (PCN) 563
Request to Revise Administrative Controls
San Onofre Nuclear Generating Station, Units 2 and 3

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) hereby requests amendments to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre, Units 2 and 3, respectively. The proposed amendments affect the following Technical Specifications (TSs): Section 2.0, "Safety Limits (SLs)" and Section 5.0, "Administrative Controls;" specifically, Section 5.1, "Responsibility;" Section 5.2, "Organization;" Section 5.3, "Unit Staff Qualifications;" Section 5.5, "Procedures, Programs, and Manuals;" and Section 5.8, "High Radiation Area."

This amendment application proposes to delete duplicative notification, reporting, and restart requirements if a safety limit is violated; replace plant-specific position titles with generic position titles; and make several additional administrative changes. The proposed deletion of notification, reporting, and restart requirements if a safety limit is violated deletes requirements from the TSs that are duplicative or contained in other regulations or required to comply with regulations (10 CFR 50.36). The proposed changes to replace plant-specific position titles with generic position titles do not eliminate any of the qualifications, responsibilities, or requirements for these positions. The plant-specific titles are identified in the San Onofre Nuclear Generating Station, Units 2 and 3, Updated Final Safety Analysis Report.

The proposed changes to TS 2.0, "Safety Limits (SLs)" are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-5-A, Rev. 1, "Delete safety limit violation notification requirements." The proposed generic position title changes to TS 5.0, "Administrative Controls," are consistent with TSTF-65-A, Rev. 1, "Use of generic titles for utility positions." The proposed changes to TS 2.0 and the proposed generic position title changes to TS 5.0 are consistent with NUREG-1432,

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"Standard Technical Specifications – Combustion Engineering Plants," Revision 3. The proposed deletion of duplicative notification, reporting, and restart requirements if a safety limit is violated is to improve the content and presentation of Administrative Controls. The proposed elimination of plant-specific position titles from the Technical Specifications will facilitate future plant organizational changes.

SCE has evaluated this request under the standards set forth in 10 CFR 50.92(c) and determined that a finding of "no significant hazards consideration" is justified.

SCE is making no new commitments that would result from NRC approval of the proposed amendments.

SCE requests that these amendments be implemented within 60 days from the date of issuance.

If you have any questions or require additional information, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,

Brian Katz

Enclosures

1. Notarized Affidavits
2. Licensee's Evaluation of the Proposed Changes

Attachments:

A. Existing Technical Specification pages, Unit 2
B. Existing Technical Specification pages, Unit 3
C. Markup of Technical Specification pages, Unit 2
D. Markup of Technical Specification pages, Unit 3
E. Retyped Technical Specification pages, Unit 2
F. Retyped Technical Specification pages, Unit 3
G. Markup of Bases pages, Unit 2

cc: B. S. Mallett, Regional Administrator, NRC Region IV
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3
S. Y. Hsu, California Department of Health Services, Radiologic Health Branch

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 2 of the San Onofre Nuclear Generating Station	)))))	Docket No. 50-361 Amendment Application No. 246

SOUTHERN CALIFORNIA EDISON COMPANY, et al., pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 246. This amendment application consists of Proposed Change Number (PCN) 563 to Facility Operating License NPF-10. PCN-563 is a request to revise Technical Specification (TS) 2.0, "Safety Limits (SLs)" to delete duplicative notification, reporting, and restart requirements if a safety limit is violated and to revise TS 5.0, "Administrative Controls," to replace plant-specific position titles with generic position titles and make several additional administrative changes. Specific TS 5.0 sections to be revised are Section 5.1, "Responsibility;" Section 5.2, "Organization;" Section 5.3, "Unit Staff Qualifications;" Section 5.5, "Procedures, Programs, and Manuals;" and Section 5.8, "High Radiation Area."

State of California
County of San Diego

Brian Katz
Brian Katz, Vice President

Subscribed and sworn to ~~(or affirmed)~~ before me this 14th day of July, 2006, by Brian Katz

personally known to me ~~or proved to me on the basis of satisfactory evidence~~ to be the person who appeared before me.

Dawn A. Farrell
Notary Public

DAWN A. FARRELL
Commission # 1623105
Notary Public - California
San Diego County
My Comm. Expires Nov 20, 2009

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	)))))	Docket No. 50-362 Amendment Application No. 231

SOUTHERN CALIFORNIA EDISON COMPANY, et al., pursuant to 10 CFR 50.90, hereby submit Amendment Application No. 231. This amendment application consists of Proposed Change Number (PCN) 563 to Facility Operating License NPF-15. PCN-563 is a request to revise Technical Specification (TS) 2.0, "Safety Limits (SLs)" to delete duplicative notification, reporting, and restart requirements if a safety limit is violated and to revise TS 5.0, "Administrative Controls," to replace plant-specific position titles with generic position titles and make several additional administrative changes. Specific TS 5.0 sections to be revised are Section 5.1, "Responsibility;" Section 5.2, "Organization;" Section 5.3, "Unit Staff Qualifications;" Section 5.5, "Procedures, Programs, and Manuals;" and Section 5.8, "High Radiation Area."

State of California
County of San Diego

Brian Katz
Brian Katz, Vice President

Subscribed and sworn to ~~(or affirmed)~~ before me this 14th day of July, 2006, by Brian Katz

personally known to me ~~or proved to me on the basis of satisfactory evidence~~ to be the person who appeared before me.

Dawn A. Farrell
Notary Public

DAWN A. FARRELL
Commission # 1623105
Notary Public - California
San Diego County
My Comm. Expires Nov 20, 2009

ENCLOSURE 2

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3
EVALUATION FOR
PROPOSED CHANGE NUMBER 563

SUBJECT: License Amendment Application to Revise Administrative Controls

1.0 DESCRIPTION

2.0 PROPOSED CHANGE

3.0 BACKGROUND

4.0 TECHNICAL ANALYSIS

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

5.2 Applicable Regulatory Requirements/Criteria

6.0 PRECEDENT

7.0 ENVIRONMENTAL CONSIDERATION

8.0 REFERENCES

ATTACHMENTS:

A. Existing Technical Specification pages, Unit 2
B. Existing Technical Specification pages, Unit 3
C. Markup of Technical Specification pages, Unit 2
D. Markup of Technical Specification pages, Unit 3
E. Retyped Technical Specification pages, Unit 2
F. Retyped Technical Specification pages, Unit 3
G. Markup of Bases pages, Unit 2

LICENSE AMENDMENT REQUEST
TO REVISE ADMINISTRATIVE CONTROLS

1.0 DESCRIPTION

This request is to amend Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, respectively.

The proposed amendments affect the following Technical Specifications (TSs): Section 2.0, "Safety Limits (SLs)" and Section 5.0, "Administrative Controls," specifically, Section 5.1, "Responsibility;" Section 5.2, "Organization;" Section 5.3, "Unit Staff Qualifications;" Section 5.5, "Procedures, Programs, and Manuals;" and Section 5.8, "High Radiation Area."

This amendment application proposes to delete duplicative notification, reporting, and restart requirements if a safety limit is violated; replace plant-specific position titles with generic position titles; and make several additional administrative changes. The proposed deletion of notification, reporting, and restart requirements if a safety limit is violated deletes requirements from the TSs that are duplicative or contained in other regulations or required to comply with regulations (10 CFR 50.36). This amendment application proposes to change "Vice President – Nuclear Generation" to "corporate officer with direct responsibility for the plant" or "specified corporate officer," "Vice President – Engineering & Technical Services" to "specified corporate officer," "cognizant Vice President within the Nuclear Organization" to "cognizant corporate officer," and "Health Physics Manager" to "radiation protection manager." The proposed changes to replace plant-specific position titles with generic position titles do not eliminate any of the qualifications, responsibilities, or requirements for these positions. The plant-specific titles are identified in the San Onofre Nuclear Generating Station, Units 2 and 3, Updated Final Safety Analysis Report (UFSAR). Several additional administrative changes are also requested.

The proposed change to TS 2.0, "Safety Limits (SLs)" is consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-5-A, Rev. 1, "Delete safety limit violation notification requirements." The proposed generic position title changes to TS 5.0, "Administrative Controls," are consistent with TSTF-65-A, Rev. 1, "Use of generic titles for utility positions." These proposed changes to both TS 2.0 and TS 5.0 are consistent with NUREG-1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 3. The proposed deletion of duplicative notification, reporting, and restart requirements if a safety limit is violated is to improve the content and presentation of Administrative Controls. The proposed elimination of plant-specific position titles from the Technical Specifications will facilitate future plant organizational changes.

2.0 PROPOSED CHANGE

The proposed change is to revise the Technical Specifications as follows:

TS 2.0 SAFETY LIMITS (SLs), Section 2.2, "SL Violations"

Delete the following Parts 2.2.3, 2.2.4, 2.2.5, and 2.2.6:

A. 2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.
B. 2.2.4 Within 24 hours, notify the Vice President – Nuclear Generation and the Nuclear Safety Group (NSG) Supervisor.
C. 2.2.5 Within 60 days of the violation, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50. 73. The LER shall be submitted to the NRC, the NSG Supervisor, and the Vice President – Nuclear Generation.
D. 2.2.6 Operation (Modes 1 and 2) of the unit shall not be resumed until authorized by the NRC.

TS 5.0 ADMINISTRATIVE CONTROLS, Section 5.1, "Responsibility"

Section 5.1, "Responsibility," parts 5.1.1, 5.1.2, and 5.1.3:

Replace "Vice President – Nuclear Generation" with "corporate officer with direct responsibility for the plant."

TS 5.0 ADMINISTRATIVE CONTROLS, Section 5.2, "Organization"

A. Part 5.2.1 Onsite and Offsite Organizations, Subpart 5.2.1.a:

Add ", including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications," to the last sentence. This sentence will then read as follows: "These relationships, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, are documented in the UFSAR."

B. Part 5.2.1 Onsite and Offsite Organizations, Subpart 5.2.1.b: Replace "Vice President – Nuclear Generation" with "corporate officer with direct responsibility for the plant."

C. Part 5.2.1 Onsite and Offsite Organizations, Subpart 5.2.1.c: Replace the plant-specific titles "the Vice President – Engineering & Technical Services" and "the Vice President – Nuclear Generation" with "A specified corporate officer (or officers) and revise this part as follows: "A specified corporate officer (or officers) shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety."

D. Part 5.2.2 UNIT STAFF, Subpart 5.2.2.d: Replace "health physics technician" with "radiation protection technician."

E. Part 5.2.2 UNIT STAFF, Subpart 5.2.2.e: Replace "cognizant Vice President within the Nuclear Organization" with "cognizant corporate officer."

F. Part 5.2.2 UNIT STAFF, Subpart 5.2.2.f: Replace "Manager, Unit 2/3 Plant Operations" with "Manager, Plant Operations," and delete the second sentence: "The Control Operators and Assistant Control Operators shall hold a Reactor Operator's license or Senior Reactor Operator's license."

TS 5.0 ADMINISTRATIVE CONTROLS, Section 5.3, "Unit Staff Qualifications"

Part 5.3.1: Replace "Health Physics Manager" with "radiation protection manager."

TS 5.0 ADMINISTRATIVE CONTROLS, Section 5.5, "Procedures, Programs, and Manuals"

Part 5.5.2, "Programs and Manuals," Subpart 5.5.2.1.1.b: Replace "Vice President – Nuclear Generation" with "corporate officer with direct responsibility for the plant," and delete "his" before "designee."

TS 5.0 ADMINISTRATIVE CONTROLS, Section 5.8, "High Radiation Area"

Part 5.8.2: Replace "shift supervisor" with "shift manager" and replace "health physics supervisor" with "radiation protection supervisor."

These proposed changes are shown on the marked-up TS pages provided in the attachments as follows:

EXISTING TECHNICAL SPECIFICATONS:

Unit 2: See Attachment A
Unit 3: See Attachment B

PROPOSED TECHNICAL SPECIFICATIONS
(Additions highlighted and deletions struck-out)

Unit 2: See Attachment C
Unit 3: See Attachment D

PROPOSED TECHNICAL SPECIFICATIONS (with changes)

Unit 2: See Attachment E
Unit 3: See Attachment F

Consistent with the changes proposed above, the TS Bases for TS 2.0 Safety Limits (SLs) and TS Bases for TS 3.0 Limiting Condition for Operation (LCO) Applicability will be revised. The Bases changes for Unit 2 are provided for information only (See Attachment G).

3.0 BACKGROUND

The proposed changes affect the requirements for the Safety Limits and Administrative Controls sections of the TS. According to 10 CFR 50.36(c)(5), "Administrative controls are the provisions relating to organization and management, procedures, record keeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner."

The proposed changes to delete notification, reporting, and restart requirements if a safety limit is violated are to improve the content and presentation of Administrative Controls. The proposed changes are modeled after TSTF-5-A, Rev. 1 and NUREG-1432, Rev. 3.

The proposal to replace plant-specific position/organizational titles with generic titles will facilitate future plant organizational changes by eliminating the need to process a license amendment application. A description of plant-specific titles is in the UFSAR. The proposed changes are modeled after TSTF-65-A, Rev. 1 and NUREG-1432, Rev. 3.

4.0 TECHNICAL ANALYSIS

Safety Limits Section 2.0

The proposed change to remove the duplicative requirements to report safety limit violations from the TSs is considered an administrative action. These reporting requirements are duplicative of what is already contained in the regulations (i.e., 10 CFR 50.36). The reporting requirements in 10 CFR 50.36 require that appropriate prompt notifications are made to the NRC and that Licensee Event Reports (LERs) are submitted to the NRC. 10 CFR 50.36 requires that these reports be performed in accordance with the requirements of 10 CFR 50.72 and 10 CFR 50.73. Therefore, if a TS safety limit is violated, appropriate reporting will be made to the NRC in accordance with the regulations. Removal of duplicative reporting requirements from the TSs results in simplification of the TSs and Bases and less administrative burden to track duplicative reporting requirements. Adequate administrative controls exist in administrative programs at SONGS, Units 2 and 3 for the identification and necessary reporting of safety limit violations in accordance with 10 CFR 50.36, 10 CFR 50.72, and 10 CFR 50.73.

There is no deviation in the proposed SONGS TSs or Bases changes from the pre-approved TSTF-5-A, Rev. 1 or NUREG-1432, Rev. 3.

Administrative Controls Section 5.0

Changes are proposed to use generic staff position title teprminology in place of plant-specific position title terminology in the following Administrative Controls 5.0 Sections: 5.1, "Responsibility;" 5.2, "Organization;" 5.3, "Unit Staff Qualifications;" 5.5, "Procedures, Programs, and Manuals;" and 5.8, "High Radiation Area." In particular, the following position titles would be revised as follows: replace "Vice President – Nuclear Generation" with "corporate officer with direct responsibility for the plant," "cognizant Vice President within the Nuclear Organization" with "cognizant corporate officer," and "Health Physics Manager" with "radiation protection manager." Use of these generic terms is consistent with TSTF-65-A, Rev. 1 and NUREG-1432, Revision 3.

These changes are administrative and do not modify the qualifications, responsibilities, or requirements for the position.

Administrative Controls Section 5.2, "Organization"

A. In part 5.2.1.a, the proposal to add ", including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications," to the last sentence is for completeness and is consistent with TSTF-65-A, Rev. 1 and NUREG-1432, Rev. 3, Section 5.1.

B. In Part 5.2.1.c, the proposal to replace the plant specific titles "the Vice President – Engineering & Technical Services" and "the Vice President – Nuclear Generation" with "A specified corporate officer (or officers)" allows one or more corporate officers to be responsible for plant nuclear safety. The proposed wording will make Part 5.2.1.c consistent with TSTF-65, Rev. 1 and NUREG-1432, Rev. 3.

C. In part 5.2.2.d, the proposed use of generic position title "radiation protection technician" is consistent with TSTF-65-A, Rev. 1 and NUREG-1432, Rev. 3, Section 5.1.

D. In part 5.2.2.f, the proposed replacement of the title "Manager, Unit 2/3 Plant Operations" with "Manager, Plant Operations" is to make this title in the TSs consistent with the current title.

E. In part 5.2.2.f, deleting the sentence, "The Control Operators and Assistant Control Operators shall hold a Reactor Operator's license or Senior Reactor Operator's license." removes unnecessary detail from the TSs and is consistent with NUREG-1432, Rev. 3, part 5.2.2.e. Operator license requirements are specified in 10 CFR 55, Operators' Licenses.

These changes are administrative and do not modify the qualifications, responsibilities, or requirements for the positions.

Administrative Controls Section 5.5, "Procedures, Programs, and Manuals"

In subpart 5.5.2.1.1, "Licensee-initiated changes to the ODCM," item b. the word "his" is proposed to be deleted to make the reference to the "Vice President-Nuclear Generation" gender neutral. (As stated above, the title "Vice President-Nuclear Generation" is proposed to be changed to "corporate officer with direct responsibility for the plant.")

This change is administrative and does not modify the qualifications, responsibilities, or requirements for the position.

Administrative Controls Section 5.8, "High Radiation Area"

In TS 5.8.2, the proposed title changes of "shift supervisor" to the generic title "shift manager" and "health physics supervisor" to the generic title "radiation protection supervisor" are consistent with the intent of TSTF-65-A, Rev. 1.

These changes are administrative and do not modify the qualifications, responsibilities, or requirements for the positions.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

The changes proposed by this license amendment application would revise the Safety Limits Section 2.0 and Administrative Controls Section 5.0 of the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3 Technical Specifications (TSs) to delete duplicative notification, reporting, and restart requirements if a safety limit is violated from the TSs, replace several plant-specific position titles with generic position titles, and make several additional administrative changes.

The change associated with duplicative notification, reporting, and restart requirements if a safety limit is violated is consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-5-A, Rev. 1, "Delete notification, reporting, and restart requirements if a safety limit is violated." The proposed change is also consistent with NUREG-1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 3. This proposed change is to improve the content and presentation of Administrative Controls.

The changes associated with the generic position titles are consistent with TSTF-65-A, Rev. 1, "Use of generic titles for utility positions." These proposed changes are also consistent with NUREG-1432, Revision 3. The plant-specific titles are identified in the SONGS Updated Final Safety Analysis Report (UFSAR). The proposed elimination of plant-specific titles from the TSs will facilitate future plant organizational changes.

The other changes are administrative and do not modify the qualifications, responsibilities, or requirements for the positions.

Southern California Edison has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed change to remove the duplicative safety limit reporting requirements from the TSs does not affect the plant or operation of the plant. The change simply removes duplicative information from the TSs that is covered in the NRC regulations. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed changes to make plant-specific position/organizational titles more generic do not affect any plant structures, systems, and components, and have no effect on plant operations. The proposed changes are administrative and do not affect any existing limits. Accident initial conditions, probability, and assumptions remain as previously analyzed. The proposed changes will have no effect on accident initiation frequency. The proposed changes do not invalidate the assumptions used in evaluating the radiological consequences of any accident. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The remaining changes are administrative and do not modify the qualifications, responsibilities, or requirements for the positions. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any previously evaluated?

   Response: No.

   The proposed change to remove the duplicative safety limit reporting requirements from the TSs does not introduce any new accident scenarios, failure mechanisms, or limiting single failures. All systems, structures, and components previously required for the mitigation of a transient remain capable of fulfilling their intended design functions. The proposed change has no adverse effect on any safety-related system or component and does not challenge the performance or integrity of any safety related system. This change is considered an administrative action to remove duplicative reporting requirements. Therefore, this proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

   The proposed changes to make plant-specific position/organizational titles more generic are administrative and do not introduce any new or different accident initiators. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

   The remaining proposed changes are administrative and do not modify the qualifications, responsibilities, or requirements for the positions. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

   Response: No.

   The proposed changes are administrative and do not involve any reduction in a margin of safety. Removal of duplicative information, replacing plant-specific position titles with generic position titles, and the other proposed administrative changes do not affect compliance with the regulations. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The function of the "Administrative Controls" section of the Technical Specifications, as stated in 10 CFR 50.36(c)(5), is to provide "provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." Under the proposed changes, Technical Specifications 2.0 and 5.0 will continue to meet these objectives.

Regulatory Guide (RG) 1.33, Revision 2, "Quality Assurance Program Requirements (Operation)," February 1978, states that the requirements included in American National Standards Institute (ANSI) N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," are acceptable to the NRC staff and provide an adequate basis for complying with the quality assurance requirements of Appendix B to 10 CFR Part 50, subject to listed provisions. The proposed changes do not affect the Southern California Edison (SCE) Quality Assurance Program (UFSAR Chapter 17) commitment (subject to the alternatives and clarifications described in the Quality Assurance Program) to the requirements of RG 1.33, Rev. 2 and the endorsed standard.

The proposed change to remove the notification, reporting, and restart requirements if a safety limit is violated from the TSs simply removes duplicative information from the TSs that is covered in the NRC regulations (i.e., 10 CFR 50.36). The reporting requirements in 10 CFR 50.36 require that appropriate prompt notifications are made to the NRC and that Licensee Event Reports (LERs) are submitted to the NRC. 10 CFR 50.36 requires that these reports be performed in accordance with the requirements of 10 CFR 50.72 and 10 CFR 50.73. Therefore, if a TS safety limit is violated, appropriate reporting will be made to the NRC in accordance with the regulations. Adequate administrative controls exist in administrative programs at SONGS, Units 2 and 3 for the identification and necessary reporting of safety limit violations in accordance with 10 CFR 50.36, 10 CFR 50.72, and 10 CFR 50.73. This change is consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-5-A, Rev. 1, "Delete notification, reporting, and restart requirements if a safety limit is violated." The proposed change is also consistent with NUREG-1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 3.

The proposed changes from plant-specific to generic position titles are consistent with TSTF-65-A, Rev. 1, "Use of generic titles for utility positions." The proposed changes from plant-specific to generic position titles are also consistent with NUREG-1432, Revision 3. Additional administrative changes are proposed

which do not modify the qualifications, responsibilities, or requirements for the positions.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the NRC's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 PRECEDENT

The proposed change to remove the duplicative notification, reporting, and restart requirements if a safety limit is violated from the TSs is consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-5-A, Rev. 1, "Delete notification, reporting, and restart requirements if a safety limit is violated." The proposed change is also consistent with NUREG-1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 3. This change is also consistent with the license amendment application dated June 24, 2004 from Michael P. Gallagher (Exelon Nuclear) for Peach Bottom Atomic Power Station, Units 2 and 3: Subject: License Amendment Request, Incorporation of Previously NRC-Approved Generic Technical Specification Changes. The NRC approved this license amendment request by letter dated May 10, 2006.

The proposed changes to replace plant-specific position titles with generic position titles are consistent with TSTF-65-A, Rev. 1, "Use of generic titles for utility positions." These proposed changes are also consistent with NUREG-1432, Revision 3. Replacing plant-specific position titles with generic position titles is also consistent with the license amendment application dated April 20, 2005 from Mark B. Bezilla (First Energy Nuclear Operating Company) for the Davis-Besse Nuclear Power Station, Unit 1, Subject: License Amendment Application to Revise Administrative Controls (License Amendment Request No. 04-0019). The NRC approved this license amendment application by letter dated February 7, 2006.

7.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and /or indemnity requirements, or (ii) changes to record keeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

8.0 REFERENCES

1. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-5-A, Rev. 1, "Delete safety limit violation notification requirements"

2. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-65-A, Rev. 1, "Use of generic titles for utility positions"

3. NUREG-1432, "Standard Technical Specifications – Combustion Engineering Plants," Revision 3

4. Regulatory Guide (RG) 1.33, Revision 2, "Quality Assurance Program Requirements (Operation)," February 1978

5. American National Standards Institute (ANSI) N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants"

6. April 20, 2005 letter from Mark B. Bezilla (Davis-Besse/FirstEnergy Nuclear Operating Company) to the USNRC Document Control Desk, Subject: License Amendment Application to Revise Administrative Controls (License Amendment Request No. 04-0019)

7. February 7, 2006 letter from Stephen P. Sands (NRC) to Mark B. Bezilla (Davis-Besse/FirstEnergy Nuclear Operating Company), Subject: Davis-Besse Nuclear Power Station, Unit 1 – Issuance of Amendment Re: Administrative Controls (TAC No. MC6805)

8. June 24, 2004 letter from Michael P. Gallagher (Peach Bottom Atomic Power Station, Units 2 and 3/ Exelon Nuclear), Subject: License Amendment Request, Incorporation of Previously NRC-Approved Generic Technical Specification Changes.

9. May 10, 2006 letter from Richard V. Guzman (NRC), Subject: Peach Bottom Atomic Power Station, Units 2 and 3 – Issuance of Amendments Re: Incorporation of Previously NRC Approved Generic Technical Specification Changes (TAC Nos. MC3683, ...)

PCN-563

Attachment A

EXISTING TECHNICAL SPECIFICATIONS

SAN ONOFRE UNIT 2

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, departure from nucleate boiling ratio (DNBR) shall be maintained at $\geq$ 1.31.

2.1.1.2 In MODES 1 and 2, peak fuel centerline temperature shall be maintained at < 5080°F, decreasing by 58°F per 10,000 MWD/MTU and adjusted for burnable poison per CENPD-382-P-A.

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at $\leq$ 2750 psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.4 Within 24 hours, notify the Vice President - Nuclear Generation and the Nuclear Safety Group (NSG) Supervisor.

2.2.5 Within 60 days of the violation, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the NSG Supervisor, and the Vice President - Nuclear Generation.

(continued)

2.0 SLs

2.2 SL Violations (continued)

2.2.6 Operation (Modes 1 and 2) of the unit shall not be resumed until authorized by the NRC.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The Vice President-Nuclear Generation shall be responsible for overall unit operation and maintenance of Units 2 and 3 at San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities and operations which affect the safety of the plant, site personnel, and/or the general public. A management directive to this effect, signed by the Vice President-Nuclear Generation shall be reissued to all site/station personnel on an annual basis.

5.1.3 The Control Room Supervisor (CRS) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice President-Nuclear Generation, shall be issued annually to all site/station personnel. The confines of the Control Room Area shall be defined as depicted in the Licensee Controlled Specification (LCS). During any absence of the CRS from the Control Room Area while the Unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator's (SRO) license shall be designated to assume the Control Room command function. During any absence of the CRS from the Control Room Area while the Unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator's license shall be designated to assume the Control Room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These relationships are documented in the UFSAR.

b. The Vice President-Nuclear Generation shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The Vice President-Engineering & Technical Services, and the Vice President-Nuclear Generation shall have corporate responsibility for overall plant nuclear safety. The Vice President-Nuclear Generation shall take any measures needed to ensure acceptable performance of the staff in operating and maintaining the plant to ensure nuclear safety. The Vice President-Engineering & Technical Services shall take any measures needed to ensure acceptable performance of the staff in providing technical support to the plant to ensure nuclear safety.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A health physics technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the cognizant Vice President within the Nuclear Organization, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF (continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant Vice President within the Nuclear Organization, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

f. The Manager, Unit 2/3 Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license. The Control Operators and Assistant Control Operators shall hold a Reactor Operator's license or Senior Reactor Operator's license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except a) the Health Physics Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and b) multi-discipline supervisors who shall meet or exceed the qualifications listed below.

In addition, the Shift Technical Advisor shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

Multi-discipline supervisors shall meet or exceed the following qualifications:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience which shall include three years power plant experience of which one year is at a nuclear plant.

c. Training: Complete the multi-discipline supervisor training program.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.2.1 Offsite Dose Calculation Manual (ODCM)

a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program;

b. The ODCM shall also contain the Radioactive Effluent Controls required by Specification 5.5.2.3 and the Radiological Environmental Monitoring programs required by the LCS, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radioactive Effluent Release Report required by Specification 5.7.1.2 and Specification 5.7.1.3.

5.5.2.1.1 Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s);

2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3. Documentation of the fact that the change has been reviewed and found acceptable.

b. Shall become effective upon review and approval by the Vice President-Nuclear Generation or his designee.

(continued)

5.8. High Radiation Area (continued)

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift supervisor on duty or health physics supervisor. Doors shall remain locked except during periods of access by personnel under an approved REP that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the REP, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

PCN-563

Attachment B

EXISTING TECHNICAL SPECIFICATIONS

SAN ONOFRE UNIT 3

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, departure from nucleate boiling ratio (DNBR) shall be maintained at ≥ 1.31.

2.1.1.2 In MODES 1 and 2, peak fuel centerline temperature shall be maintained at < 5080°F, decreasing by 58°F per 10,000 MWD/MTU and adjusted for burnable poison per CENPD-382-P-A.

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at ≤ 2750 psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.4 Within 24 hours, notify the Vice President - Nuclear Generation and the Nuclear Safety Group (NSG) Supervisor.

2.2.5 Within 60 days of the violation, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the NSG Supervisor, and the Vice President - Nuclear Generation.

(continued)

2.0 SLs

2.2 SL Violations (continued)

2.2.6 Operation (Modes 1 and 2) of the unit shall not be resumed until authorized by the NRC.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The Vice President-Nuclear Generation shall be responsible for overall unit operation and maintenance of Units 2 and 3 at San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities and operations which affect the safety of the plant, site personnel, and/or the general public. A management directive to this effect, signed by the Vice President-Nuclear Generation shall be reissued to all site/station personnel on an annual basis.

5.1.3 The Control Room Supervisor (CRS) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice President-Nuclear Generation, shall be issued annually to all site/station personnel. The confines of the Control Room Area shall be defined as depicted in the Licensee Controlled Specification (LCS). During any absence of the CRS from the Control Room Area while the Unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator's (SRO) license shall be designated to assume the Control Room command function. During any absence of the CRS from the Control Room Area while the Unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator's license shall be designated to assume the Control Room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These relationships are documented in the UFSAR.

b. The Vice President-Nuclear Generation shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The Vice President-Engineering & Technical Services, and the Vice President-Nuclear Generation shall have corporate responsibility for overall plant nuclear safety. The Vice President-Nuclear Generation shall take any measures needed to ensure acceptable performance of the staff in operating and maintaining the plant to ensure nuclear safety. The Vice President-Engineering & Technical Services shall take any measures needed to ensure acceptable performance of the staff in providing technical support to the plant to ensure nuclear safety.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A health physics technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the cognizant Vice President within the Nuclear Organization, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF (continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant Vice President within the Nuclear Organization, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

f. The Manager, Unit 2/3 Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license. The Control Operators and Assistant Control Operators shall hold a Reactor Operator's license or Senior Reactor Operator's license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except a) the Health Physics Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and b) multi-discipline supervisors who shall meet or exceed the qualifications listed below.

In addition, the Shift Technical Advisor shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

Multi-discipline supervisors shall meet or exceed the following requirements:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience which shall include three years power plant experience of which one year is at a nuclear plant.

c. Training: Complete the multi-discipline supervisor training program.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.2.1 Offsite Dose Calculation Manual (ODCM)

a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program;

b. The ODCM shall also contain the Radioactive Effluent Controls required by Specification 5.5.2.3 and the Radiological Environmental Monitoring programs required by the LCS, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radioactive Effluent Release Report required by Specification 5.7.1.2 and Specification 5.7.1.3.

5.5.2.1.1 Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain: |

1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s);

2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3. Documentation of the fact that the change has been reviewed and found acceptable. |

b. Shall become effective upon review and approval by the Vice President-Nuclear Generation or his designee. |

(continued)

5.8. High Radiation Area (continued)

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift supervisor on duty or health physics supervisor. Doors shall remain locked except during periods of access by personnel under an approved REP that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the REP, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas, where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

PCN-563

Attachment C

PROPOSED TECHNICAL SPECIFICATIONS

SAN ONOFRE UNIT 2

(Additions highlighted and deletions struck-out)

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, departure from nucleate boiling ratio (DNBR) shall be maintained at ≥ 1.31.

2.1.1.2 In MODES 1 and 2, peak fuel centerline temperature shall be maintained at < 5080°F, decreasing by 58°F per 10,000 MWD/MTU and adjusted for burnable poison per CENPD-382-P-A.

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at ≤ 2750 psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

~~2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.~~

~~2.2.4 Within 24 hours, notify the Vice President - Nuclear Generation and the Nuclear Safety Group (NSG) Supervisor.~~

~~2.2.5 Within 60 days of the violation, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the NSG Supervisor, and the Vice President - Nuclear Generation.~~

(continued)

2.0 SLs

~~2.2 SL Violations (continued)~~

~~2.2.6 Operation (Modes 1 and 2) of the unit shall not be resumed until authorized by the NRC.~~

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The corporate officer with direct responsibility for the plant ~~Vice President-Nuclear Generation~~ shall be responsible for overall unit operation and maintenance of Units 2 and 3 at San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities and operations which affect the safety of the plant, site personnel, and/or the general public. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant ~~Vice President-Nuclear Generation~~ shall be reissued to all site/station personnel on an annual basis.

5.1.3 The Control Room Supervisor (CRS) shall be responsible for the Control Room command function. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant ~~Vice President-Nuclear Generation~~, shall be issued annually to all site/station personnel. The confines of the Control Room Area shall be defined as depicted in the Licensee Controlled Specification (LCS). During any absence of the CRS from the Control Room Area while the Unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator's (SRO) license shall be designated to assume the Control Room command function. During any absence of the CRS from the Control Room Area while the Unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator's license shall be designated to assume the Control Room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These relationships, including the plant-specific titles of those personnel fulfilling the responsibilities for the positions delineated in these Technical Specifications, are documented in the UFSAR.

b. The corporate officer with direct responsibility for the plant ~~Vice-President-Nuclear-Generation~~ shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. A specified corporate officer (or officers) shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
~~The Vice-President-Engineering & Technical Services, and the Vice-President-Nuclear-Generation shall have corporate responsibility for overall plant nuclear safety. The Vice-President-Nuclear-Generation shall take any measures needed to ensure acceptable performance of the staff in operating and maintaining the plant to ensure nuclear safety. The Vice-President-Engineering & Technical Services shall take any measures needed to ensure acceptable performance of the staff in providing technical support to the plant to ensure nuclear safety.~~

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A radiation protection ~~health physics~~ technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the cognizant corporate officer~~ Vice President within the Nuclear Organization~~, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF (continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant corporate officer ~~Vice President within the Nuclear Organization~~, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

f. The Manager, ~~Unit 2/3~~ Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license. ~~The Control Operators and Assistant Control Operators shall hold a Reactor Operator's license or Senior Reactor Operator's license.~~

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except a) the radiation protection manager ~~Health Physics Manager~~ who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and b) multi-discipline supervisors who shall meet or exceed the qualifications listed below.

In addition, the Shift Technical Advisor shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

Multi-discipline supervisors shall meet or exceed the following qualifications:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience which shall include three years power plant experience of which one year is at a nuclear plant.

c. Training: Complete the multi-discipline supervisor training program.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.2.1 Offsite Dose Calculation Manual (ODCM)

a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program;

b. The ODCM shall also contain the Radioactive Effluent Controls required by Specification 5.5.2.3 and the Radiological Environmental Monitoring programs required by the LCS, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radioactive Effluent Release Report required by Specification 5.7.1.2 and Specification 5.7.1.3.

5.5.2.1.1 Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s);

2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3. Documentation of the fact that the change has been reviewed and found acceptable.

b. Shall become effective upon review and approval by the corporate officer with direct responsibility for the plant ~~Vice-President-Nuclear-Generation~~ or ~~his~~ designee.

(continued)

5.8. High Radiation Area (continued)

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager ~~supervisor~~ on duty or radiation protection ~~health physics~~ supervisor. Doors shall remain locked except during periods of access by personnel under an approved REP that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the REP, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

PCN-563

Attachment D

PROPOSED TECHNICAL SPECIFICATIONS

SAN ONOFRE UNIT 3

(Additions highlighted and deletions struck-out)

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, departure from nucleate boiling ratio (DNBR) shall be maintained at ≥ 1.31.

2.1.1.2 In MODES 1 and 2, peak fuel centerline temperature shall be maintained at < 5080°F, decreasing by 58°F per 10,000 MWD/MTU and adjusted for burnable poison per CENPD-382-P-A.

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at ≤ 2750 psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

~~2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.~~

~~2.2.4 Within 24 hours, notify the Vice President - Nuclear Generation and the Nuclear Safety Group (NSG) Supervisor.~~

~~2.2.5 Within 60 days of the violation, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the NSG Supervisor, and the Vice President - Nuclear Generation.~~

(continued)

2.0 SLs

~~2.2 SL Violations (continued)~~

~~2.2.6 Operation (Modes 1 and 2) of the unit shall not be resumed until authorized by the NRC.~~

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The corporate officer with direct responsibility for the plant ~~Vice President-Nuclear Generation~~ shall be responsible for overall unit operation and maintenance of Units 2 and 3 at San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities and operations which affect the safety of the plant, site personnel, and/or the general public. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant ~~Vice President-Nuclear Generation~~ shall be reissued to all site/station personnel on an annual basis.

5.1.3 The Control Room Supervisor (CRS) shall be responsible for the Control Room command function. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant ~~Vice President-Nuclear Generation~~, shall be issued annually to all site/station personnel. The confines of the Control Room Area shall be defined as depicted in the Licensee Controlled Specification (LCS). During any absence of the CRS from the Control Room Area while the Unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator's (SRO) license shall be designated to assume the Control Room command function. During any absence of the CRS from the Control Room Area while the Unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator's license shall be designated to assume the Control Room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These relationships, including the plant-specific titles of those personnel fulfilling the responsibilities for the positions delineated in these Technical Specifications, are documented in the UFSAR.

b. The corporate officer with direct responsibility for the plant ~~Vice President-Nuclear Generation~~ shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. A specified corporate officer (or officers) shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
~~The Vice President-Engineering & Technical Services, and the Vice President-Nuclear Generation shall have corporate responsibility for overall plant nuclear safety. The Vice President-Nuclear Generation shall take any measures needed to ensure acceptable performance of the staff in operating and maintaining the plant to ensure nuclear safety. The Vice President-Engineering & Technical Services shall take any measures needed to ensure acceptable performance of the staff in providing technical support to the plant to ensure nuclear safety.~~

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A radiation protection ~~health physics~~ technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the cognizant corporate officer ~~Vice President within the Nuclear Organization~~, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF (continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant corporate officer ~~Vice President within the Nuclear Organization~~, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

f. The Manager, ~~Unit 2/3~~ Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license. ~~The Control Operators and Assistant Control Operators shall hold a Reactor Operator's license or Senior Reactor Operator's license.~~

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except a) the radiation protection manager ~~Health Physics Manager~~ who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and b) multi-discipline supervisors who shall meet or exceed the qualifications listed below.

In addition, the Shift Technical Advisor shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

Multi-discipline supervisors shall meet or exceed the following requirements:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience which shall include three years power plant experience of which one year is at a nuclear plant.

c. Training: Complete the multi-discipline supervisor training program.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.2.1 Offsite Dose Calculation Manual (ODCM)

a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program;

b. The ODCM shall also contain the Radioactive Effluent Controls required by Specification 5.5.2.3 and the Radiological Environmental Monitoring programs required by the LCS, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radioactive Effluent Release Report required by Specification 5.7.1.2 and Specification 5.7.1.3.

5.5.2.1.1 Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s);

2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3. Documentation of the fact that the change has been reviewed and found acceptable.

b. Shall become effective upon review and approval by the corporate officer with direct responsibility for the plant ~~Vice-President-Nuclear Generation~~ or ~~his~~ designee.

(continued)

5.8. High Radiation Area (continued)

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager ~~supervisor~~ on duty or radiation protection ~~health physics~~ supervisor. Doors shall remain locked except during periods of access by personnel under an approved REP that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the REP, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas, where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

PCN-563

Attachment E

PROPOSED TECHNICAL SPECIFICATIONS

SAN ONOFRE UNIT 2

(with changes)

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, departure from nucleate boiling ratio (DNBR) shall be maintained at $\geq$ 1.31.

2.1.1.2 In MODES 1 and 2, peak fuel centerline temperature shall be maintained at < 5080°F, decreasing by 58°F per 10,000 MWD/MTU and adjusted for burnable poison per CENPD-382-P-A.

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at $\leq$ 2750 psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The corporate officer with direct responsibility for the plant shall be responsible for overall unit operation and maintenance of Units 2 and 3 at San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities and operations which affect the safety of the plant, site personnel, and/or the general public. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant shall be reissued to all site/station personnel on an annual basis.

5.1.3 The Control Room Supervisor (CRS) shall be responsible for the Control Room command function. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant, shall be issued annually to all site/station personnel. The confines of the Control Room Area shall be defined as depicted in the Licensee Controlled Specification (LCS). During any absence of the CRS from the Control Room Area while the Unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator's (SRO) license shall be designated to assume the Control Room command function. During any absence of the CRS from the Control Room Area while the Unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator's license shall be designated to assume the Control Room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These relationships, including the plant-specific titles of those personnel fulfilling the responsibilities for the positions delineated in these Technical Specifications, are documented in the UFSAR.

b. The corporate officer with direct responsibility for the plant shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. A specified corporate officer (or officers) shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the cognizant corporate officer, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF (continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant corporate officer, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

f. The Manager, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except a) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and b) multi-discipline supervisors who shall meet or exceed the qualifications listed below.

In addition, the Shift Technical Advisor shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

Multi-discipline supervisors shall meet or exceed the following qualifications:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience which shall include three years power plant experience of which one year is at a nuclear plant.

c. Training: Complete the multi-discipline supervisor training program.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.2.1 Offsite Dose Calculation Manual (ODCM)

a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program;

b. The ODCM shall also contain the Radioactive Effluent Controls required by Specification 5.5.2.3 and the Radiological Environmental Monitoring programs required by the LCS, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radioactive Effluent Release Report required by Specification 5.7.1.2 and Specification 5.7.1.3.

5.5.2.1.1 Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s);

2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3. Documentation of the fact that the change has been reviewed and found acceptable.

b. Shall become effective upon review and approval by the corporate officer with direct responsibility for the plant or designee.

(continued)

5.8. High Radiation Area (continued)

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty or radiation protection supervisor. Doors shall remain locked except during periods of access by personnel under an approved REP that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the REP, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

PCN-563

Attachment F

PROPOSED TECHNICAL SPECIFICATIONS

SAN ONOFRE UNIT 3

(with changes)

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, departure from nucleate boiling ratio (DNBR) shall be maintained at $\geq$ 1.31.

2.1.1.2 In MODES 1 and 2, peak fuel centerline temperature shall be maintained at < 5080°F, decreasing by 58°F per 10,000 MWD/MTU and adjusted for burnable poison per CENPD-382-P-A.

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at $\leq$ 2750 psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The corporate officer with direct responsibility for the plant shall be responsible for overall unit operation and maintenance of Units 2 and 3 at San Onofre Nuclear Generating Station, and all site support functions. He shall delegate in writing the succession to this responsibility during his absence.

5.1.2 The Shift Manager shall be responsible for the ultimate command decision authority for all unit activities and operations which affect the safety of the plant, site personnel, and/or the general public. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant shall be reissued to all site/station personnel on an annual basis.

5.1.3 The Control Room Supervisor (CRS) shall be responsible for the Control Room command function. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant, shall be issued annually to all site/station personnel. The confines of the Control Room Area shall be defined as depicted in the Licensee Controlled Specification (LCS). During any absence of the CRS from the Control Room Area while the Unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator's (SRO) license shall be designated to assume the Control Room command function. During any absence of the CRS from the Control Room Area while the Unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator's license shall be designated to assume the Control Room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These relationships, including the plant-specific titles of those personnel fulfilling the responsibilities for the positions delineated in these Technical Specifications, are documented in the UFSAR.

b. The corporate officer with direct responsibility for the plant shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. A specified corporate officer (or officers) shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF

The unit staff organization shall include the following:

a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

With both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.

b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.

c. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

Any deviation from the working hour guidelines shall be authorized in advance by the cognizant corporate officer, or designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

(continued)

5.2 Organization (continued)

5.2.2 UNIT STAFF (continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the cognizant corporate officer, or designees, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

f. The Manager, Plant Operations (at time of appointment), Shift Managers, and Control Room Supervisors shall hold a Senior Reactor Operator's license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and in the response and analysis of the plant for transients and accidents.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except a) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and b) multi-discipline supervisors who shall meet or exceed the qualifications listed below.

In addition, the Shift Technical Advisor shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

Multi-discipline supervisors shall meet or exceed the following requirements:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience which shall include three years power plant experience of which one year is at a nuclear plant.

c. Training: Complete the multi-discipline supervisor training program.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.2.1 Offsite Dose Calculation Manual (ODCM)

a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program;

b. The ODCM shall also contain the Radioactive Effluent Controls required by Specification 5.5.2.3 and the Radiological Environmental Monitoring programs required by the LCS, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radioactive Effluent Release Report required by Specification 5.7.1.2 and Specification 5.7.1.3.

5.5.2.1.1 Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

1. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s);

2. A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3. Documentation of the fact that the change has been reviewed and found acceptable.

b. Shall become effective upon review and approval by the corporate officer with direct responsibility for the plant or designee.

(continued)

5.8. High Radiation Area (continued)

5.8.2 In addition, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift manager on duty or radiation protection supervisor. Doors shall remain locked except during periods of access by personnel under an approved REP that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the REP, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas, where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated as a warning device whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

PCN-563

Attachment G

PROPOSED TECHNICAL SPECIFICATION BASES CHANGES

SAN ONOFRE UNIT 2

(Additions highlighted and deletions struck-out)

(FOR INFORMATION ONLY)

BASES (continued)

SAFETY LIMIT VIOLATIONS

The following violation responses are applicable to the reactor core SLs.

2.2.1

If SL 2.1.1.1 or SL 2.1.1.2 is violated, the requirement to go to MODE 3 places the unit in a MODE in which this SL is not applicable.

The allowed Completion Time of 1 hour recognizes the importance of bringing the unit to a MODE where this SL is not applicable and reduces the probability of fuel damage.

~~2.2.3~~

~~If SL 2.1.1.1 or SL 2.1.1.2 is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 3).~~

~~2.2.4~~

~~If SL 2.1.1.1 or SL 2.1.1.2 is violated, the appropriate senior management of the nuclear plant and the utility shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to the senior management.~~

~~2.2.5~~

~~If SL 2.1.1.1 or SL 2.1.1.2 is violated, a Licensee Event Report shall be prepared and submitted within 60 days to the NRC, Vice President - Nuclear Generation, and the NSG Supervisor. This requirement is in accordance with 10 CFR 50.73 (Ref. 4).~~

~~2.2.6~~

~~If SL 2.1.1.1 or SL 2.1.1.2 is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews,~~

(continued)

BASES

~~SAFETY LIMIT VIOLATIONS~~

~~2.2.6 (continued)~~

~~analyses, and actions are completed before the unit begins its restart to normal operation.~~

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10.

2. UFSAR, Section 15.0.3.2, "Initial Conditions."

~~3. 10 CFR 50.72.~~

~~4. 10 CFR 50.73.~~

~~5~~3. CEN-386-P-A, "Verification of the Acceptability of a 1-Pin Burnup Limit of 60 MWD/MTU for Combustion Engineering 16x16 PWR Fuel," August 1992.

~~6~~4. CENPD-382-P-A, "Methodology for Core Designs Containing Erbium Burnable Absorbers," August 1993.

BASES (continued)

SAFETY LIMIT VIOLATIONS

The following SL violation responses are applicable to the RCS pressure SLs.

2.2.2.1

If the RCS pressure SL is violated when the reactor is in MODE 1 or 2, the requirement is to restore compliance and be in MODE 3 within 1 hour.

With RCS pressure greater than the value specified in SL 2.1.2 in MODE 1 or 2, the pressure must be reduced to below this value. A pressure greater than the value specified in SL 2.1.2 exceeds 110% of the RCS design pressure and may challenge system integrity.

The allowed Completion Time of 1 hour provides the operator time to complete the necessary actions to reduce RCS pressure by terminating the cause of the pressure increase, removing mass or energy from the RCS, or a combination of these actions, and to establish MODE 3 conditions.

2.2.2.2

If the RCS pressure SL is exceeded in MODE 3, 4, or 5, RCS pressure must be restored to within the SL value within 5 minutes.

Exceeding the RCS pressure SL in MODE 3, 4, or 5 is potentially more severe than exceeding this SL in MODE 1 or 2, since the reactor vessel temperature may be lower and the vessel material, consequently, less ductile. As such, pressure must be reduced to less than the SL within 5 minutes. This action does not require reducing MODES, since this would require reducing temperature, which would compound the problem by adding thermal gradient stresses to the existing pressure stress.

~~2.2.3~~

~~If the RCS pressure SL is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 6).~~

(continued)

BASES (continued)

SAFETY LIMIT VIOLATIONS (continued)

2.2.4

If the RCS pressure SL is violated, the appropriate senior management of the nuclear plant and the utility shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and to assess the condition of the unit before reporting to the senior management.

2.2.5

If the RCS pressure SL is violated, a Licensee Event Report shall be prepared and submitted within 60 days to the NRC, Vice President - Nuclear Generation, and the NSG Supervisor. This requirement is in accordance with 10 CFR 50.73 (Ref. 7).

2.2.6

If the RCS pressure SL is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 14, GDC 15, and GDC 28.
2. ASME, Boiler and Pressure Vessel Code, Section III, Article NB-7000.
3. ASME, Boiler and Pressure Vessel Code, Section XI, Article IWX-5000.
4. 10 CFR 100.
5. UFSAR, Section 7.2, "Reactor Protective Systems"
6. 10 CFR 50.72.
7. 10 CFR 50.73.

BASES (continued)

LCO 3.0.3 (continued)

Voluntary entry into LCO 3.0.3 is permissible but requires prior approval (approval may be verbal) from either the Operations Manager, Station Manager or corporate officer with direct responsibility for the plant ~~Vice President, Nuclear Generation~~. The approval must subsequently be documented in written retrievable manner. Inadvertent entry still allows for the one hour preparation period before Actions to change MODES must begin.

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

a. The LCO is now met.

b. A Condition exists for which the Required Actions have now been performed.

c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3.

The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications

(continued)